# ESTATE OF SAMUEL MILLS DAMON



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DATE: 08/10/01

TO:

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|---|---|---|
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| **cc: Lisa Hanusiak**<br>Investigator<br>EPA Region IV | **(415) 744-1917** | (415) 744-2213 |

FROM **Kris M. Shimabukuro** PHONE: (808) 536-3717

Number of Sheets Including This Cover: 1

**Re: Confirmation of Extension to Response Deadline in 08/02/01 Notice**
842 A Mapunapuna Street, Honolulu, Hawaii 96819
Hawaii Stage & Lighting/Funtastic Party Rentals
(formerly Vermiculite of Hawaii)

Thank you for taking my telephone call today and for granting us an extension to the 48-hour response deadline set forth in the EPA's Notice Letter dated 08/02/01. As discussed, we plan to present this matter to the Trustees next week and hope to have a response to you by 08/17/01. While I do not have the authority to formally respond to the 08/02/01 Notice Letter at this time, I would like to express our intention to work "in the spirit of cooperation" with the EPA on this matter.

While we will be discussing this material with our environmental consultant, we note that the 08/02/01 Notice Letter and RA Report does not contain any specific recommendations to address the findings in connection with the various sampling activities that took place on March 1, 2001.

We greatly appreciate the professionalism and courtesy extended to the Estate by you and other members of the EPA staff. If you should have any questions, please do not hesitate to contact me at (808) 536-3717.

Thank you.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

# ACTION MEMORANDUM

DATE: 05 Oct 2001

SUBJECT: Request for Approval of a Removal Action at Hawaii Stage & Lighting Site, Honolulu, HI

FROM: Robert M. Mandel, OSC
Emergency Response Office (SFD-7-2)

TO: Keith Takata, Director
Superfund Division (SFD-1)

## I. PURPOSE

The purpose of this Action Memo is to request and document approval of the proposed removal actions described herein for the Hawaii Stage & Lighting Site, Honolulu, HI.

## II. SITE CONDITIONS AND BACKGROUND

| | |
|---|---|
| Site Status: | Non-NPL |
| Category of Removal: | Time-Critical |
| CERCLIS ID: | HIN000905895 |
| SITE ID: | HP |
| State Notification: | DOH |

### A. Site Description

#### 1. Removal Site evaluation

The U.S. Department of Transportation's John A. Volpe National Transportation Systems (Volpe) Center has an Interagency Agreement (IAG) with the U.S. Environmental Protection Agency (EPA) Region 9 for environmental engineering and related support. The Volpe Center, its contractor CDM Federal Programs Corporation (CDM Federal), and CDM Federal's subcontractor Pacific Environmental Services, Inc. (PES), have been requested by EPA Region 9 to conduct focused removal assessments (RAs) at eight locations (i.e., Libby Sister sites). These locations are eight of the twenty-one locations that have been identified as having received ore or vermiculite from Libby, Montana (MT), according to U.S. Geological Survey (USGS) and/or Bureau of Mines publications. Each of the sites has performed either small batch exfoliation, used vermiculite as part of a manufacturing process, or sold vermiculite.

This RA report addresses the former Vermiculite of Hawaii facility now occupied by Hawaii Staging & Lighting/Funtastic Party Rental & Supply, located at 842A Mapunapuna St. in Honolulu, Hawaii. All work for this assessment was conducted in accordance with Revision 1 of the Sampling and Analysis Plan (SAP) for the Libby Sister Sites (Asbestos Project) – Emergency Response and Preliminary Assessment Support (CDM Federal 2001).

The only potential contaminant of concern being investigated at these sites is asbestos, specifically amphibole asbestos (tremolite/actinolite) associated with vermiculite mined from Libby, MT. Asbestos fibers are odorless and tasteless and vary in length, structure, and chemical composition. It is believed the toxicity varies with the mineralogy and morphology of asbestos, however exposure to any type of asbestos can be fatal. Amphibole (tremolite/actinolite) asbestos, the form found at Libby, is considered by many to be the most toxic.

Human health risk from asbestos is primarily due to inhalation exposure to airborne fibers. The objectives of this RA were to determine if any potential sources of tremolite/actinolite asbestos are present at the site and to determine whether any potential sources (vermiculite product, ore, waste, etc.) had been transported offsite either for disposal, private uses by employees, or direct sale to the public.

Potential sources are likely to be related to contamination from the processing of Libby ore or vermiculite. Potential sources were investigated by sampling various media (soil, waste/product, ambient air, and dust inside buildings); gathering and verifying current and historical information on the site; and documenting any observed evidence of vermiculite product or waste.

**2. Physical location**

The site is located at 842A Mapunapuna St., Honolulu, Hawaii.

**3. Site characteristics**

Hawaii Staging & Lighting/Funtastic Party Rental is the current tenant of the site. Little history is known other than that Vermiculite of Hawaii was the believed previous tenant. The age of the on-site buildings is unknown, although the discovery of vermiculite around and inside one of the structures suggests that it is at least 20 years old. The facility is currently used by Hawaii Staging & Lighting/Funtastic Party Rental for storage and operations.

**4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant**

The amphibole asbestos found at all of the locations discussed in this Action Memorandum is a hazardous substance as defined by Section 101 of CERCLA In general, the EPA has evidence that exposure to the Libby amphibole asbestos can result in direct health effects. The Site Administrative Record for the Libby, Montana site contains many academic papers discussing the hazards associated with amphibole asbestos in general, and Libby amphibole asbestos in particular. There are a number of papers, investigations, and memoranda developed by WR Grace, the owner and operator of the Libby Asbestos Site in Libby, Montana, that document the widespread occurrence of asbestos related disease among its workers, both in

Libby (41% of Grace Libby workers with a ten year work history are reported as having asbestosis) and around the country (28% of the Grace workers handling Libby vermiculite around the country are reported as having asbestosis, e.g. see E.S. Wood, 1977, or E. Lovick, 1969).

In the Summer of 2000, the Agency for Toxic Substances and Disease Registry (ATSDR) undertook a massive asbestos health screening program involving over 6,000 people who may have been exposed to amphibole asbestos in or around Libby. The report of preliminary findings from this study showed the widespread occurrence of lung abnormalities, not only among former Grace employees, but among their families, and the population at large in Libby. ATSDR also published a study on the mortality from asbestosis in Libby, Montana, dated December 12, 2000. This study found, among other things, that the reported mortality from asbestosis in Libby was 60 times the national average. Because of the breadth and depth of the information about amphibole morbidity and mortality, a more detailed discussion of these risk will not be done within this Action Memorandum.

### A. Soil Samples

Table 4-1 identifies the index identification, sample identification code, sample locations, and analytical results for all soil samples at the Hawaii Stage & Lighting Site. Soil sample results are presented on Figure 4-1. Two of the fifteen soil samples (PA2-00093 and PA2-00094) contains at or above one percent asbestos. Both of these samples are from the northern face of the eastern annex to Building 4. Six other soil samples (including the duplicate) contain a trace amount (less than 1 percent by visual estimate) of tremolite/actinolite asbestos. These samples represent soil areas east of Building 1, along the northern border of the site, and outside the eastern wall of Building 4.

**Table 4-1**
**Results of Soil Sample Analysis**
**Hawaii Staging & Lighting/Funtastic Party Rental & Supply**
**Honolulu, HI**

| Sample Index Identification | Sample Identification Code | Sample Type | Sample Location | Result | Type of Asbestos |
|---|---|---|---|---|---|
| **Soil Samples** | | | | | |
| PA2-00087 | LSS-HIHO-SO-SO1-01-03 | Grab | East of Building 1 | Non-detect | NA |
| PA2-00088 | LSS-HIHO-SO-SO2-01-03 | Grab | East of Building 1 | Trace | Trem-Act |
| PA2-00089 | LSS-HIHO-SO-SO3-01-03 | Grab | Southern border of Building 3 | Non-detect | NA |
| PA2-00090 | LSS-HIHO-SO-SO4-01-03 | Grab | Southern border of Building 3 | Non-detect | NA |
| PA2-00091 | LSS-HIHO-SO-SO5-01-03 | Grab | Southern line of property between Building 3 & 4 | Non-detect | NA |
| PA2-00092 | LSS-HIHO-SO-SO6-01-03 | Grab | Walkway property between Building 3 & 4 | Trace | Trem-Act |
| PA2-00093 | LSS-HIHO-SO-SO7-01-03 | Grab | Northern face of eastern annex to Building 4 | Trace<br>2% | Trem-Act<br>Chrysotile |
| PA2-00094 | LSS-HIHO-SO-SO8-01-03 | Grab | Northern face of eastern annex to Building 4 | Trace<br>1% | Trem-Act<br>Chrysotile |
| PA2-00095 | LSS-DIHO-SO-SO8-01-03 | Duplicate | Duplicate of PA2-00094 | Trace<br>Trace | Trem-Act<br>Chrysotile |
| PA2-00096 | LSS-HIHO-SO-SO9-01-03 | Grab | Northern border of property | Trace<br>Trace | Trem-Act<br>Chrysotile |
| PA2-00097 | LSS-HIHO-SO-S10-01-03 | Grab | Northern border of property | Trace<br>Trace | Trem-Act<br>Chrysotile |
| PA2-00098 | LSS-HIHO-SO-S11-01-03 | Grab | Northern border of property | Non-detect | NA |
| PA2-00111 | LSS-Hawaii-SO-S12-04-08 | Grab | Northern section of Building 4 | Non-detect | NA |
| PA2-00114 | LSS-HIHO-SO-S13-01-03 | Grab | Exterior western wall of Building 4 | Trace | Trem-Act |
| PA2-00115 | LSS-HIHO-SO-S14-01-03 | Grab | Exterior western wall of Building 4 | Non-detect | NA |
| **Product Samples** | | | | | |
| PA2-00112 | LSS-HIHO-WP-P01-01-00 | Product | Northern wall in Building 4 | Trace | Trem-Act |
| PA2-00113 | LSS-HIHO-WP-P02-01-00 | Product | Eastern wall of Building 4 | Trace<br>11 % | Trem-Act<br>Chrysotile |

Notes:
All soil samples were analyzed by Polarized Light Microscopy (PLM).
Trace = Less than 1 percent asbestos by visual estimate.
Non-detect = No asbestos detected in the soil sample.
Trem-Act = Tremolite/Actinolite asbestos

### B. Dust Samples

Table 4-2 identifies the index identification number, the sample identification code, sample locations and analytical results for each of the microvacuum samples. Three of the dust samples contained both tremolite/actinolite and chrysotile asbestos structures indicating that asbestos fibers were at one time airborne in Buildings 2, 3 and 4. One dust sample found a very high asbestos concentration of 147,000,000 structures/cm$^2$ (see Table 4-2).

**Table 4-2**
**Results of Microvacuum Dust Sample Analysis**
**Hawaii Staging & Lighting/Funtastic Party Rental & Supply**
**Honolulu, HI**

| Sample Index Identification | Sample Identification Code | Sample Type | Sample Location | Result (structures) | Type of Asbestos | Asbestos Conc. (s/cm$^2$) |
|---|---|---|---|---|---|---|
| PA2-00105 | LSS-HIHO-DU-B01-1-00 | Comp. | Bldg. 1 – Three separate horizontal surfaces | ND<br>98 | Trem-Act<br>Chrysotile | < 5,105<br>714,667 |
| PA2-00106 | LSS-HIHO-DU-B02-1-00 | Comp. | Bldg. 2 – Three separate horizontal surfaces | 1<br>15 | Trem-Act<br>Chrysotile | 5,105<br>76,571 |
| PA2-00107 | LSS-HIHO-DU-B03-1-00 | Comp. | Bldg. 3 – Three separate horizontal surfaces | 2<br>20 | Trem-Act<br>Chrysotile | 102,095<br>1,020,952 |
| PA2-00108 | LSS-HIHO-DU-B04-1-00 | Comp. | Bldg. 4 – Three separate horizontal surfaces | 6<br>456 | Trem-Act<br>Chrysotile | 1,914,286<br>147,400,000 |
| PA2-00109 | LSS-HIHO-DU-000-1-00 | Blank | Blank sample | ND | NA | < 32 |
| PA2-00110 | LSS-HIHO-DU-000-2-00 | Blank | Blank sample | ND | NA | < 32 |

Notes:
All microvacuum dust samples were analyzed by ISO Method 10312.
ND = No asbestos structures detected.
Comp.= Composite
Conc. = Concentration
Trem-Act = tremolite/actinolite asbestos.
TBD = to be determined (laboratory is presently calculating values).
s/cm2 = structures per cubic centimeter

### 5. NPL status

This facility is not on the NPL.

## B. Other Actions to Date

### 1. Previous actions

There have been no previous response actions taken.

### 2. Current actions

Currently, there are no response actions underway at the Site.

## C. State and Local Authorities's Roles

### 1. State and local actions to date

There have been no State or Local actions.

### 2. Potential for continued State/local response

At this time, neither the State or local authorities have expressed a desire to conduct response actions at the Sites due to limited resources.

## III. THREATS TO PUBLIC HEALTH OR WELFARE OF THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

**A.** Adverse effects from exposure to amphibole asbestos have been documented among Grace workers in Libby, and around the country. There has also been a clear pathology associated with the secondary exposures. The medical screening conducted by ATSDR last summer clearly documents the occurrence of significant lung abnormalities among family members of former Grace employees. Likewise, the ATSDR screening also found significant rates of lung abnormalities among people with "recreational" contact with various vermiculite materials that contain the amphibole asbestos. Overall, the preliminary results of medical screening program to date show that 19 to 37% of tested participants had visible pleural abnormalities. Unfortunately, 73% of the participants who showed lung abnormalities were not associated with W.R. Grace mining or processing activities. Excluding the former miners and their immediate family, the overall abnormality rate was 12 to 24%.

In December 2000, ATSDR published the results from a standardized mortality study based on a review of a subset of death certificates from the Libby area from 1979 to 1998. Among the studies findings were the following:

-Mortality from asbestosis was approximately 40 to 60 times higher than expected.
-Mortality from mesothelioma, a rare type of cancer associated with asbestos exposure also appeared elevated.

The above discussed information, along with the host of other information has led the EPA to make the following general conclusions: 1)Whenever materials associated with Libby vermiculite can be found in bulk, there will most likely be associated with it high concentrations of amphibole asbestos; 2) The amphibole asbestos found in the Libby vermiculite is highly toxic; 3) The amphibole asbestos associated with the Libby vermiculite readily produces respirable fibers when disturbed; and 4) Any time when there exists a condition such that there will be people in or around the amphibole asbestos there is a high probability for exposure, and this probability presents an unacceptable risk to public health.

With this information for background, the following is a discussion on the criteria used to determine the need for a Removal Action found in the National Contingency Plan at 40 CFR 300.415(b)(2) that relate to the conditions now found at the Request for Approval of a Removal Action at Hawaii Stage & Lighting Site, Honolulu, HI. The evaluation of these factors clearly demonstrates that

the conditions at the Site may present an imminent and substantial threat to human health and the environment and meet the criteria for initiating a Removal Action under Section 300.415(b)(2) of the NCP.

**1. Actual or potential exposure to hazardous substances or pollutants or contaminants by nearby populations or the food chain**

Potential exposure to hazardous substances by workers and nearby populations could result from the amphibole asbestos onsite. If the asbestos is disturbed by natural or man-caused activities it could migrate offsite.

**2. Actual or potential contamination of drinking water supplies**

This is not an issue at these Sites.

**3. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release**

This is not an issue at these Sites.

**4. High levels of hazardous substances or pollutants or contaminants in soils at or near the surface, that may migrate**

The outdoor soil contamination is currently unstable and subject to migrating offsite if disturbed.

**5. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released**

Wind or rain could cause offsite migration of the asbestos outdoors at these Sites.

**6. Threat of fire or explosion**

This is not an issue at these Sites.

**7. Availability of other appropriate Federal or State response mechanisms to respond to the release**

Other Agencies lack the authority and resources to respond to these Sites.

**B. Threats to the Environment**

If the asbestos-contaminated soils migrate offsite they will expose the public to this dangerous carcinogen.

## IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of airborne asbestos from this site, if not addressed by implementing the response action selected in this Action Memorandum, presents an imminent and substantial endangerment to public health, or welfare, or the environment.

## V. PROPOSED ACTIONS AND ESTIMATED COSTS

### A. Proposed Actions

substantial endangerment to public health, or welfare, or the environment.

## V. PROPOSED ACTIONS AND ESTIMATED COSTS

### A. Proposed Actions

#### 1. Proposed action description

Soil containing elevated asbestos concentrations will be removed, the excavation will be back-filled with clean soil, and capped with concrete or asphalt. Upward-facing horizontal surfaces in buildings where microvacuum samples contained greater than 10,000 s/cm$^2$, will be microvacuumed to remove any surface asbestos-containing dust. All asbestos will be transported offsite to an approved treatment, storage, or disposal facility. This will remove the threat of public exposure to the asbestos and eliminate any pathways for migration.

#### 2. Contribution to remedial performance

Not applicable at this time.

#### 3. Description of alternative technologies

Alternative technologies have not been considered at this time.

#### 4. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs: Offsite Disposal Rule, RCRA
State ARARs: None known at this time.

#### 6. Project schedule

The removal action is expected to begin shortly after the effective date of the Administrative Order on Consent or Unilateral Administrative Order.

### B. Estimated Costs

Because this removal actions is expected to be undertaken by the responsible parties pursuant to an Administrative Order on Consent, a detailed cost estimate has not been prepared. Should it become likely that EPA will conduct the removal action, an amended Action Memorandum will be submitted detailing response costs.

## VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Due to the current lack of response to potentially dangerous concentrations of asbestos at these sites, any delay in the response will result in continuing human exposure to asbestos.

## VII. OUTSTANDING POLICY ISSUES

Pursuant to EPA Guidance on Non-NPL Removal Actions Involving Nationally Significant or Precedent -Setting Issues (OSWER Directive 9360.0-19), dated March 3, 1989, removals involving asbestos as the principal contaminant of concern require Headquarters' Director of the Office of

herein. Region 9 has received Headquarters' concurrence.

## VIII. ENFORCEMENT

See Attachment.

## IX. RECOMMENDATION

This decision document represents the selected removal action for the Hawaii Stage & Lighting Site, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP.

Conditions at the Site meet the NCP section 300.415(b)(2) criteria for a removal. It is recommended that you approve the proposed removal action. No project ceiling is being requested at this time, and no extramural funds are expected to be required. EPA oversight costs are expected to be less than $10,000.

Keith Takata — 10-25-01

Approval Signature Date

Keith Takata, Director
Superfund Division

Disapproval Signature Date

Keith Takata, Director
Superfund Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

# ACTION MEMORANDUM

DATE: 05 Oct 2001

SUBJECT: Request for Approval of a Removal Action at Hawaii Stage & Lighting Site, Honolulu, HI

FROM: Robert M. Mandel, OSC
Emergency Response Office (SFD-7-2)

TO: Daniel A. Meer, Chief
Response, Planning and Assessment Branch
Superfund Division (SFD-7)

## I. PURPOSE

The purpose of this Action Memo is to request and document approval of the proposed removal actions described herein for the Hawaii Stage & Lighting Site, Honolulu, HI.

## II. SITE CONDITIONS AND BACKGROUND

| | |
|---|---|
| Site Status: | Non-NPL |
| Category of Removal: | Time-Critical |
| CERCLIS ID: | tbd |
| SITE ID: | HP |
| State Notification: | DOH |

### A. Site Description

#### 1. Removal Site evaluation

The U.S. Department of Transportation's John A. Volpe National Transportation Systems (Volpe) Center has an Interagency Agreement (IAG) with the U.S. Environmental Protection Agency (EPA) Region 9 for environmental engineering and related support. The Volpe Center, its contractor CDM Federal Programs Corporation (CDM Federal), and CDM Federal's subcontractor Pacific Environmental Services, Inc. (PES), have been requested by EPA

| MAIL CODE | SFD-7-2 | | ORC | SFD 9 | SFD-1 | |
|---|---|---|---|---|---|---|
| SURNAME | mandel | | ACox | Meer | K | |
| DATE | 10/05/01 | 10/5/01 | 10-8-01 | 10/10/01 | 10-19-01 | |

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